

FILED

JUN 25 2018

Clerk, U.S. District Court
Texas Eastern

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
 §
v. § No. 4:18CR 106
 § Judge CRONE
SYED RAZVI §

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

Count One

Violation: 18 U.S.C. § 371
(Conspiracy to Smuggle Goods out of
the United States and to Violate the
International Emergency Economic
Powers Act)

At all times relevant to this Information:

1. Defendant **Syed Razvi** was a naturalized citizen of the United States of America who was born in Pakistan.
2. A Co-Conspirator known to the United States Attorney as “PZ” was a citizen of the United States of America who resided in Plano, Texas.
3. American Coating Technologies was a company located in Carrollton, Texas that was owned and operated by PZ.
4. U.S. Company 1 was a company with a facility in Colorado that manufactured Radiation Hardened Integrated Circuits (RHICs) that could be used in space exploration.

5. U.S. Company 2 was a company located in California that manufactured RHICs that could be used in space exploration.

6. Title 18, United States Code, Section 554 (Smuggling goods from the United States) made it a federal crime to fraudulently or knowingly export or send from the United States any merchandise contrary to any law or regulation of the United States or to receive, buy, sell, or facilitate the sale of merchandise prior to exportation, knowing the merchandise to be intended for exportation contrary to any law or regulation.

7. Title 50, United States Code, Section 1705 (the International Emergency Economic Powers Act) and related laws and regulations, including the Export Administration Regulations, Title 14, Code of Federal Regulations, Sections 730-774, made it a federal crime to willfully export or attempt to export items from the United States without the required export licenses.

8. Between June 2015 and March 2016, RHICs with model number UT8MR8M8-50XTC, manufactured by U.S. Company 1, required an export license from the Department of Commerce for export to Russia.

9. Between June 2015 and March 2016, RHICs with model number XQR4VSX55-10CF1140V, manufactured by U.S. Company 2, required an export license from the Department of Commerce for export to the People's Republic of China.

10. From about June 2015 and continuing until about March 2016, in the Eastern District of Texas and elsewhere, Defendant **Syed Razvi**, Co-Conspirator PZ, and other persons, known and unknown to the United States Attorney, knowingly and willfully agreed to illegally smuggle and export U.S. Company 1 model number

UT8MR8M8-50XTC and U.S. Company 2 model number XQR4VSX55-10CF1140V

RHICs (hereinafter, the RHICs) from the United States to China and Russia.

11. It was the purpose of the conspiracy to obtain the RHICs and export them to a place outside of the United States contrary to applicable laws and regulations and without the required export licenses.

12. To effect the objects of the conspiracy, Defendant **Syed Razvi**, Co-Conspirator PZ, and others, known and unknown to the United States Attorney, committed the following **OVERT ACTS**:

A. Defendant **Syed Razvi** identified customers that wanted to purchase the RHICs for use in China's space program and Russia's space program, took orders for the RHICs from those customers, and relayed those orders to Co-Conspirator PZ.

B. Defendant **Syed Razvi** arranged for a total of approximately \$1,575,983 to be placed into a bank account controlled by Co-Conspirator PZ so he could use the money to purchase the RHICs for the Chinese and Russian customers.

C. Co-Conspirator PZ created false paperwork and made false statements in an attempt to hide the conspiracy from United States officials.

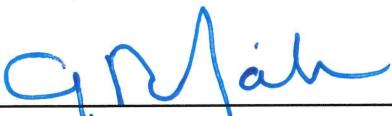
D. From the Eastern District of Texas and elsewhere Co-Conspirator PZ sent orders for the RHICs to U.S. Company 1 and U.S. Company 2, certified that American Coating Technologies was the end-user of the RHICs knowing that it was not, and used the money described in paragraph 12-B to pay for the RHICs.

E. Co-Conspirator PZ received the RHICs that he had ordered, removed them from their original packaging, repackaged them, falsely declared that they were "touch screen parts," and shipped them out of the United States.

F. Co-Conspirator PZ also received what he believed were the RHICs that he had ordered, removed them from their original packaging, repackaged them, falsely declared that they were "touch screen parts," and attempted to ship them out of the United States.

In violation of 18 U.S.C. § 371.

JOSEPH D. BROWN
UNITED STATES ATTORNEY



G.R. JACKSON
Assistant United States Attorney



Date

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NOTICE OF PENALTY

Count One

VIOLATION: 18 U.S.C. § 371

PENALTY: Imprisonment of not more than 5 years
and/or a fine of not more than \$ 250,000 and
a term of supervised release of not more than 3years.

SPECIAL ASSESSMENT: \$100.00